ASH GROVE CEMENT COMPANY

"WESTERN REGION"

December 21, 1994

Mr. Fred Austin
Puget Sound Air Pollution Control Agency
110 Union Street, Suite 500
Seattle, WA. 98119-3958

Re: Notice of Violation #32263

Dear Mr. Austin,

Your letter of January 11, 1994 requested a report from Ash Grove Cement Co. on corrective action taken or proposed to address CEM and emission violations reported on the CEM-1 Form report for November 1993.

SULFUR DIOXIDE
As PSAPCA is aware, Ash Grove's operating procedure up through November 1993 was to add sodium bicarbonate to the kiln exit gas when the Raw Mill was not in operation. This procedure continued after RATA testing on November 11, 1993. Since the sulfur dioxide monitor did not certify, we did not know when or if it was necessary to add the sorbant for emission control while the mill was running. At the December 1, 1993 meeting with PSAPCA, Ash Grove agreed to use the uncertified analyzer for compliance reporting, not withstanding the fact that it overstates the actual level of emission. From that point forward, we added sorbant to keep the emission below permitted levels. Form CEM-1 report for the full month of December 1993 shows that the number of emission exceedances have been reduced by 81% of those reported during the previous 18 days. The new analyzer should be installed by July 1, 1994. We will confirm the bias reported by the current instrument after our February kiln maintenance period.

NITROGEN OXIDES
The excess nitrogen oxides emissions occurred following the start-up of the kiln and were caused by unstable conditions associated with this period. The emissions did not occur during normal operations.

The remedial program as discussed at the meeting on December 1, 1993, is to continue work to correct burner design flaws and to commission the coal firing system. (See December 3, 1993 letter to Mr. James Nolan from Nathan Fernow attached.) Form CEM-1 report for the month of December 1993 shows that there have been 66% fewer exceedances even though the coal firing system did <u>not</u> operate. We believe this to be the result of improved kiln operations. As of January 1, the coal system has been brought on line and will further assist in keeping the emission under permitted levels.

626675

AGCS2M000442

3801 EAST MARGINAL WAY, SOUTH • SEATTLE, WA 98134 • PLANT OFFICE: (206) 623-5596 • FAX: (206) 623-5355

CARBON MONOXIDE
The excess carbon monoxide emission occurred as a result of a malfunction in the kiln inlet gas analyzer. This malfunction provided erroneous information to the Production Control operator leading to the emission. Once the problem with the analyzer was recognized it was diagnosed and repaired as quickly as possible. Form CEM-1 report for the month of December 1993 shows that there have been no emission exceedances for CO.

CEMS
The CEMS were taken off line for unscheduled maintenance on November 18 to clean a plugged filter in the sample line. At that time it was determined that the filter and needle valves should be replaced and the sample line cleaned. This maintenance was done on November 19. PSAPCA's Form CEM-1 solicits information on "CEM Violations". Ash Grove frankly does not know what PSAPCA regards as a CEM violation. We understand that other permittees have raised similar questions. We would like to discuss the issue with PSAPCA as it bears on our reporting obligation.

Pursuant to Section 3.09 of Regulation I, Ash Grove requests a meeting with PSAPCA to discuss our progress toward meeting compliance and several concerns we have over the requirements of our permit.

If you should have any further questions, please call me at (206) 623-5596.

Sincerely,

Gerald J. Brown
Manager, Safety and Environment

Copy: KJR
ESP
HES
JTH

ASH GROVE CEMENT COMPANY

WESTERN REGION
6720 S.W. MACADAM AVE., SUITE 300
PORTLAND, OREGON 97219-2312
(503) 293-2333

December 3, 1993

Mr. James Nolan
Puget Sound Air Pollution Control Agency
110 Union Street, Suite 500
Seattle, WA 98101-2038

Re: Seattle Plant Operation during SO_2 CEMS replacement.

Dear Mr. Nolan,

As discussed at our meeting December 1, 1993, Ash Grove is ordering a new sample extraction system and SO_2 analyzer for the Seattle plant. This new system should be delivered and installed by July 1, 1994. During the interim, we will maintain SO_2 emissions below our permitted levels utilizing the existing analyzer, knowing that it reports higher than actual. We will reconfirm the high bias of this analyzer upon starting the plant after our February kiln maintenance period.

The NO_x emissions from the plant may occasionally exceed the prescribed limits as we continue to work to correct the gas burner design flaws that cause it to produce an excessively hot flame. The higher emissions do not arise when the plant burns coal, however we have experienced delays in the conversion to coal due to problems with commissioning the coal firing systems. We expect that the coal firing systems will be operational by January 1, 1994 and we should be able to maintain our permitted emission levels from that time forward, provided we have no further problems with the coal systems.

We will begin to provide the reports as required by Article 12.04 as of the date of our RATA test, November 11, 1993.

Sincerely,

Nathan A. Fernow
Quality Control Manger
Western Region

cc: Ken Rone - Ash Grove Cement Co., Seattle
Matthew Cohen - Heller, Ehrman, White & McAuliffe
Jerry Brown - Seattle

D R A F T

Form CEM–1

PUGET SOUND AIR POLLUTION CONTROL AGENCY

ENGINEERING DIVISION

110 UNION STREET, SUITE 500, SEATTLE, WA 98101

(206) 689–4405

Registration No. 11339

Month of December 1993

CEM – MONTHLY SUMMARY REPORT

Date Recieved:

Name:	Ash Grove Cement Co.				
Address:	3801 E Marginal Way S	City:	Seattle, WA 98134		
Contact:	Jon Trygve Hille			Tele #:	(206) 623–5596

Basic Equipment:	Cement Kiln
Control Equipment:	Dry Scrubber Baghouse
CEM Equipment:	Continuous Emission Monitors

Complete a Form CEM–2 for each parameter checked below:

		Make & Model	Allowed Limit	* CEM Violations	Emission Violations
x	Opacity	Lear Siegler	20% @ 1 hr		2
		Dynatron 1100M	5% @ 3 min		3
x	SO2	Lear Siegler	33 ppmc @ 1 hr		26
		8960	40 lb/hr @ 1 hr		17
x	NOx	Lear Siegler	668 ppmc @ 1 hr		12
		8940	590 lb/hr @ 1 hr		0
			478 ppmc @ 1 hr		1
			422 lb/hr @ 1 hr		0
x	CO	Beckman Ind.	1000 ppmc @ 8 hrs		0
		880	538 lb/hr @ 8 hrs		0
x	O2	Servomax 1420	n/a		n/a
x	Flow	EMRC	n/a		n/a

Attach a supplemental report for each emission violation and for each violation of monitoring requirements (e.g. less than 90% valid hours of daily monitoring). Violations are subject to PSAPCA enforcement actions, including civil penalties of up to $10,000 per day

QUARTERLY (OR RATA) CERTIFICATION TESTING:

* See Jerry Brown 12/21/93 letter.

	Last Completed	Passed	Failed	Next Scheduled
RATA Certification	11/13/93	O2,NOx,CO,Flow	SO2	
Qtrly Certification	None			

I hereby certify the attached information is true and accurate to the best of my knowledge.

Signature

Date

AGCS2M000445